

## REMARKS

Reconsideration and allowance of the subject application are respectfully solicited.

Claims 19, 21, 24, 25, 27, 30, and 31 are pending, with Claims 19, 25, and 31 being independent. Claims 20, 22, 23, 26, 28, and 29 have been cancelled without prejudice. Claims 19, 21, 24, 25, 27, 30, and 31 have been amended. In this regard, the Official Action asks that Applicants identify which figures of the drawings are those to which the claims pertain. In response, Applicants respectfully wish to direct the Examiner's attention to, e.g., Fig. 1, and respectfully note that: (1) amended claims 19, 21, 24, 25, 27, 30, and 31 are supported by, for example, the description of the first embodiment; (2) in Claims 19 and 21, a "pixel information storing unit" corresponds, e.g., to a field information storage unit 101, 102 shown in Figure 1 (the field information storage unit 101, 102 is a unit which has the similar function as a field information storage unit 101, 102 shown in Figure 9); a "reference pixel motion information generating unit" corresponds to a motion detector 111 shown in Figure 1; a "reference pixel motion information storing unit" corresponds to, e.g., a field motion information storage unit 112, 113; an "interpolation pixel motion determining unit" corresponds to an AND device 114 and a motion information generation unit 115 shown in Figure 1; (3) in Claim 24, Applicants submit that an "interpolation pixel information generating unit" corresponds, e.g., to an interpolation information selecting unit 109 shown in Figure 1; and (4) Applicants submit that Claims 25, 27, and 30 find support for at least the reasons discussed above with respect to Claims 19, 21, and 24, with Claim 31 also corresponding to Claim 19. Of course, the claims are not limited to the disclosed embodiments.

Claims 19 through 30 were rejected under 35 U.S.C. § 112, 1<sup>st</sup> paragraph, for lack of support on the grounds that the "third motion" and "fourth motion" are not supported. All rejections are respectfully traversed, and are submitted to have been obviated by the deletion of said language from the claims.

Claims 19 through 22, 24 through 27, 30, and 31 were rejected under 35 U.S.C. § 102(b) over previously-cited WO 02/37847 A1 ("WO '847"). The Official Action asks, in this

regard, that Applicants specifically identify which claimed features are not shown in this cited document. All rejections are respectfully traversed.

Claims 19, 25, and 31 variously recite, *inter alia*, determining whether motion information on an interpolation pixel is a moving image or a still image based on the motion information on a reference pixel adjacent to an interpolation pixel in a field of interest, and the motion information on a reference pixel in a field previous the field of interest and the motion information on a reference pixel in a next field following the field of interest, the reference pixels in the previous field and the next field being at the same position as the interpolation pixel in the field of interest (in combination with generating motion information as claimed).

However, Applicants respectfully submit that WO '847 fails to disclose or suggest at least the above-discussed claimed features as recited, *inter alia*, in Claims 19, 25, and 31.

Applicants respectfully submit that WO '847 discloses, e.g., that a difference judgment circuit 5 calculates a difference between a pixel value P of a corresponding pixel in the (n-1)th field and a pixel value S of a corresponding pixel in the (n+1)th field; an interpolation circuit 3 calculates an interpolation value M from pixels in the nth field; an intermediate value selection circuit 4 selects an intermediate value from among the pixel value P in the (n-1)th field, the interpolation value M in the nth field, and the pixel value S in the (n+1)th field, and a calculation method for generating the interpolation signal is changed (the intermediate value selection circuit 4 selects inter-field interpolation or intra-field interpolation based on the judgment result, and outputs the interpolation pixel value). In this regard, Applicants respectfully note that field memories 1 and 2 in WO '847 output image signals after a delay of one field, whereas in contrast the above-discussed claimed features speak of, *inter alia*, storing motion information and determining whether motion information on a reference pixel is a moving image or a still image based on... motion information..., as claimed.

Applicants further respectfully submit that there has been no showing of any indication of motivation in the cited documents that would lead one having ordinary skill in the art to arrive at the above-discussed claimed features.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the present invention and are dependent from independent claims discussed above. Therefore, separate and individual consideration of each dependent claim is respectfully requested.

This Amendment After Final Rejection is an earnest attempt to advance prosecution and reduce the number of issues, and is believed to clearly place this application in condition for allowance. Furthermore, Applicants respectfully submit that a full appreciation of these amendments will not require undue time or effort given the Examiner's familiarity with this application. Moreover, this Amendment was not earlier presented because Applicants earnestly believed that the prior Amendment placed the subject application in condition for allowance. Accordingly, entry of this Amendment under 37 C.F.R. § 1.116 is respectfully requested.

Applicants submit that this application is in condition for allowance, and a Notice of Allowance is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

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